



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200

DALLAS, TEXAS 75202

DATE: August 17, 1989

SUBJECT: ACTION MEMORANDUM

Request for Removal Action at the Harry Hines Drum  
Warehouse Site, Dallas, Dallas County, Texas  
Cerclis #TXD987980976

Site ID# R4

Category of Removal: Classic Emergency

FROM:

*Patrick L. Hammack*  
Patrick L. Hammack

On-Scene Coordinator

Emergency Response/Site Investigation Section (6E-EI)

TO:

Robert E. Layton, Jr.  
Regional Administrator (6A)

THRU:

*Russell F. Rhoades*  
f Director  
Environmental Services Division (6E)

I. PURPOSE:

This memorandum confirms verbal approval for a Removal Action pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA) at the Harry Hines Drum Warehouse Site. The proposed action involves the categorization, removal and disposal of approximately 250 drums containing hazardous substances, and excavation and disposal of contaminated soil.

This action meets the criteria for initiating a removal action under Section 300.65 of the National Contingency Plan (NCP) and is anticipated to require less than twelve months and under \$2 million for completion.

Gazda  
6E-EI  
*[Signature]*

Mullins  
6E-EI  
*[Signature]*

Parker  
6C-S  
*[Signature]*

*Stokes*  
6C-S  
*[Signature]*

Parr  
6H-EC  
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## II. BACKGROUND:

### A. National Significance:

This site is not of national significance.

### B. Site Description:

The Harry Hines Drum Warehouse Site is an abandoned chemical manufacturing and storage facility. The site is located at 10333 Harry Hines Boulevard, Dallas, Dallas County, Texas. (See Attachment 1.) The warehouse is a single story structure with approximately 40,000 square feet of floor space in a mixed commercial and residential community. The site was formerly occupied by Mag Chemicals, Inc. An EPA criminal investigation is in progress, and information concerning the past operations is expected to be included in upcoming criminal indictments. Drummed wastes from the warehouse were also dumped at two other locations. The first is located on Spangler Street, approximately one mile north of the warehouse on Harry Hines. The second is located in south Dallas. The term "site" as used in this Action Memorandum shall include all three locations.

### C. Incident Characteristics:

Current information concerning the site indicates that Mag Chemical Inc., was evicted by the Dallas Constables Office. The evicted tenants reportedly told the City about the hazardous materials being left in the warehouse at the time of the eviction. The owner of the warehouse, Mr. Mitchell Barnett, apparently hired a third party, Mr. Jackson to clean out the warehouse. In the process of cleaning the warehouse, Mr. Jackson was apprehended by Special Agents from the EPA Office of Criminal Investigation and the Federal Bureau of Investigation while dumping drums of hazardous waste at the Spangler St. location. During interrogation, Mr. Jackson admitted to dumping additional drums at the south Dallas location and indicated that more drums were located at the Harry Hines Boulevard warehouse.

The Emergency Response Branch (ERB) was assisting the EPA Special Agents by sampling the drums at the Spangler St. location when Mr. Jackson was caught. Inspection of Mr. Jackson's vehicle revealed seven (7) drums labeled Hydrofluoric Acid 70%. This discovery prompted an investigation of the warehouse. Many drums containing hazardous substances appeared to have been dumped on the warehouse floor and allowed to run into the city storm drainage system alongside Harry Hines Boulevard. Investigations revealed that strong acids had leaked or been spilled at all three locations. The City of Dallas hired an emergency response contractor to stabilize the drums from the Spangler Street location.

D. Quantity and Types of Substances Present:

There were approximately 250 drums total at the three locations. Many of the drums at the Spangler St. and south Dallas locations leaked, causing contamination of the soil. The warehouse floor is covered with the mixed contents of many drums. This mixture of chemicals has been allowed to run under doors into the parking lot facing Harry Hines Boulevard and into a drainage ditch near a mobile home park behind the warehouse. Field tests revealed the pH of the spilled liquids at all three locations was below 1.0. Some of the CERCLA designated hazardous substances listed on the drum labels are:

- |                                       |                    |
|---------------------------------------|--------------------|
| 1. hydrofluoric acid (70%)            | (corrosive)        |
| 2. phosphoric acid                    | (corrosive)        |
| 3. concentrated sulfuric acid         | (corrosive)        |
| 4. hydrochloric acid                  | (corrosive)        |
| 5. trisodium phosphate                | (caustic)          |
| 6. styrene monomer                    | (flammable liquid) |
| 7. toluene                            | (flammable liquid) |
| 8. dimethyl ammonium chloride         | (caustic)          |
| 9. methyl ethyl acetone               | (flammable liquid) |
| 10. sodium nitrate                    | (caustic)          |
| 11. potassium hydroxide               | (caustic)          |
| 12. various herbicides and pesticides | (poisons)          |

E. State and Local Authorities Roles:

The City of Dallas reportedly evicted the previous facility operators. The Dallas Fire Department responded to complaints of odors and spills while the company was in operation. During the initial entry for inspection by the ERB, the fire department provided fire trucks and backup personnel. The City of Dallas hired an emergency response contractor to stabilize drums from the Spangler St. location.

F. Federal Action To Date:

The EPA Office of Criminal Investigation (OCI) became aware of the site on July 31, 1989, when a caller informed them of the Spangler St. drum dump location. The OCI requested ERB assistance in obtaining samples to aid in their investigation. On Tuesday August 1, 1989, the ERB was gathering samples when the dumpers were apprehended while attempting to drop another truckload of drums at the Spangler St. location. OCI interrogations led to the discovery of the south Dallas location and warehouse. The EPA On-Scene Coordinator (OSC) determined that the site met the criteria specified in Section 300.65 of the National Contingency Plan for a Classic Emergency Removal Action and requested \$250,000 from the Regional Administrator to initiate immediate response activities. The Regional Administrator granted a verbal approval for the emergency removal on August 1, 1989.

G. NPL Status:

This site is not on the National Priorities List.

III. THREAT TO PUBLIC HEALTH, WELFARE OR THE ENVIRONMENT

A. Threat to Public Health or Welfare:

This site presents a threat to public health. A potential for direct contact with hazardous substances exists. Contact with these acids and corrosives will cause severe burns. A potential for fire and explosion also exists at the site. Off site migration of hazardous substances is visibly apparent. The leakage from the dumped drums has contaminated the adjacent soil at the Spangler St. and south Dallas drum dumpsites. Hazardous materials from the warehouse have leaked under the doors and flowed across the concrete parking lot into roadside drainage ditches along Harry Hines Boulevard, and a mobile home park access road behind the warehouse. Children have been observed playing behind the warehouse near contaminated areas. Site runoff pathways are visibly contaminated with residue from the leaking drums.

The materials present at the warehouse are not compatible and because of the potential for spontaneous exothermic reactions an increased threat of a fire or explosion exist. The flammable liquids would increase the severity of a fire, and could cause the fire to spread since many of these liquids do not mix with water. For this reason the fire department temporarily deactivated secured the sprinkler system in the warehouse so it would not activate in the event of a fire.

B. Threats to the Environment:

An air release from a chemical reaction or fire would result in a much greater extent of contamination in the surrounding air, soil, water and vegetation. Soil contamination has occurred at all three locations.

IV. ENFORCEMENT

See Attachment 2.

VI. PROPOSED ACTIONS AND COSTS

A. Proposed Actions:

The Classic Emergency Removal Action will include the removal and disposal of all drums containing hazardous substances and the removal of contaminated soil at all three locations. This action will eliminate the threat of fire and explosion, and the potential for direct human contact with hazardous substances. The action will include temporary relocation of offsite drums to

the warehouse location, Hazard Categorization of all drum contents, sampling of drainage pathways and soil to determine the extent of contamination, and removal of all contaminated soil.

The action is expected to take approximately 30 days of on site activity. The response was initiated by verbal approval of the Regional Administrator and was not initiated under the OSC's \$50,000 authority. The action is not expected to require a twelve-month or a \$2 million exemption.

#### SUMMARY OF COSTS

##### EXTRAMURAL COSTS:

ERCS Cleanup Contractor .....	\$700,000
TAT Contractor Costs .....	\$100,000
Extramural Subtotal .....	\$800,000
15% Project Contingency .....	\$120,000
Total Extramural Cost .....	\$920,000

##### INTRAMURAL COSTS:

EPA Direct .....	\$30,000
EPA Indirect .....	\$50,000
EPA Total .....	\$80,000
TOTAL PROJECT CEILING .....	\$1,000,000

##### B. Alternative Actions:

Due to the emergency nature of the incident, no alternative actions were considered.

##### VII. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN

If an action had not been initiated under the Classic Emergency procedures the extent of contamination and subsequent cost for the removal would have been greater because of the leaking condition of the drums. The imminent threat to the public would have been increased because of the potential for incompatible liquids to mix.

##### VIII. IMPORTANT POLICY ISSUES

Not applicable.

IX. RECOMMENDATION

Because conditions at the site meet the NCP section 300.65 criteria for a removal, I request your written approval for the verbally approved removal action. The estimated total project costs are \$1,000,000 of which \$700,000 are for extramural cleanup contractor costs. You may indicate your written approval by signing below.

APPROVE:

Robert E. Layton Jr.

DATE:

Aug. 18, 1989